

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 SAN FRANCISCO DIVISION

4

5 **IN RE GOOGLE PLAY STORE**
ANTITRUST LITIGATION

6 THIS DOCUMENT RELATES TO:

7 *Epic Games, Inc. v. Google LLC et al.*, Case
8 No. 3:20-cv-05671-JD

9 *In re Google Play Consumer Antitrust*
10 *Litigation*, Case No. 3:20-cv-05761-JD

11 *State of Utah et al. v. Google LLC et al.*, Case
12 No. 3:21-cv-05227-JD

13 *Match Group, LLC et al. v. Google LLC et al.*,
14 Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**[PROPOSED] ORDER RE: GOOGLE'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL MATERIALS
SUBMITTED IN CONNECTION WITH
PLAINTIFFS' PROPOSED REMEDY RE
GOOGLE'S DESTRUCTION OF CHAT
EVIDENCE**

Judge: Hon. James Donato

1 Having considered Google's Administrative Motion to File Under Seal Materials
 2 Submitted in Connection With Plaintiffs' Proposed Remedy Re Google's Destruction of Chat
 3 Evidence and any materials submitted in support thereto, pursuant to Local Rules 7-11 and 79-5;

4 **IT IS HEREBY ORDERED:**

5 The following portions of the *Plaintiffs' Proposed Remedy Re Google's Destruction of*
 6 *Chat Evidence* (MDL Dkt. No. 609) and supporting documents may be filed under seal:

C. Cramer Decl. Exhibit	Document or Portion of Document Sought to be Sealed	Designating Party	Ruling
Exhibit A1	Page 5, Lines 6-8 (between "to spend" and "in 2020 which would").	Google (Cramer Declaration ¶9)	
Exhibit A1	Page 6, Line 28 to Page 7, Line 1 (between "are responsible for" and "of Google Play's approximately"; between "approximately" and "in annual revenue").	Google (Cramer Declaration ¶10)	
Exhibit A1	Page 7, Lines 23-28 (between "pay Samsung" and "over four years"; between "would secure" and "for Google").	Google (Cramer Declaration ¶11)	
Exhibit A1	Page 8, Lines 1-11 (between "pay out between" and "over the four-[year] term"; between "drive down to" and "the fees Google").	Google (Cramer Declaration ¶12)	
Exhibit A1	Page 8, Lines 15-20 (between "millions, and then" and "to move Samsung's"; between "as part of their current" and "RSA deals").	Google (Cramer Declaration ¶13)	
Exhibit A1	Page 9, Lines 8-15 (between "determined that over" and "of revenue was at"; between "developers at least" and "dollars to avoid").	Google (Cramer Declaration ¶14)	

1	Exhibit A1	Page 10, Line 13 (between “prepared to spend another” and “to stop ABK”).	Google (Cramer Declaration ¶15)	
2	Exhibit A1	Page 10, Line 18 (between “worth more than” and (“Moskowitz”).	Google (Cramer Declaration ¶16)	
3	Exhibit A1	Page 10, Line 25 (between “paid Supercell ‘up to” and “(Id. at 179:10-13”).	Google (Cramer Declaration ¶17)	
4	Exhibit A1	Page 13, Lines 25-28 (between “because of their” and “revenue share deal”; between “Google pays Apple” and “under this agreement”; between “this agreement, and” and end of sentence).	Google (Cramer Declaration ¶18)	
5	Exhibit A1	Page 14, Line 2 (between “was somewhere between” and “in 2021”).	Google (Cramer Declaration ¶19)	
6	Exhibit A2	Exhibit 2, page -220 (first bullet: between “to spend” and “to buy”, between “to buy” and “exclusive”, between “to” and “per year”; second bullet: between “to offer” and “revenue share”; third bullet: between “sufficient to drive” and “of Samsung”; fourth bullet: between “challenging; is” and “annual benefit”; fifth bullet: between “margins of” and “in long”, between “offset” and “net investment”.)	Google (Cramer Declaration ¶20)	
7	Exhibit A2	Exhibit 2, page -221 (the figures that begin the first five bullet points; the second bullet point between “titles for” and “each title”; the figures that begin the five sub-bullet points under the fifth bullet, “revenue upside from co-listing”; sixth bullet: between	Google (Cramer Declaration ¶21)	

1	“(2 year investment)” and “rev share”, between “rev share” and “exclusivity payment”; seventh bullet: between “Phase 2 Profits:” and “revenue share”, between “revenue share” and “cost”, between “store =” and “yr profit”).		
6	Exhibit A2	Exhibit 2, page -228, Table (all figures in the column titled “Phase 1: 3 Exclusives”; all figures in the column titled “Phase 2: 50 co-listed games”).	Google (Cramer Declaration ¶22)
9	Exhibit A2	Exhibit 2, page -232 (the chart, as well as all figures and charts in the tables).	Google (Cramer Declaration ¶23)
12	Exhibit A2	Exhibit 2, page -233, (figure in title, prior to “of Play connected devices”; entire graphic representation.)	Google (Cramer Declaration ¶24)
15	Exhibit A3	Exhibit 3, page -819 (entire page).	Google (Cramer Declaration ¶25)
16	Exhibit A3	Exhibit 3, Page -820 (entire boxes labeled “Cross-Google Service Packs + Partner Pods,” “Samsung + Google Gaming Collaboration,” and “Accrue value back to Google”).	Google (Cramer Declaration ¶26)
20	Exhibit A3	Exhibit 3, page -822 (between “HVUS:” and “of buyers”; between “spend” and “of app”; between “concentration of” and “reflect 2018”; entire top box).	Google (Cramer Declaration ¶27)
24	Exhibit A3	Exhibit 3, page -824 (icons in column 1 and figures in column 2 in rows 2- 6; text in footnote between “Projected” to “spend projection”).	Google (Cramer Declaration ¶28)
27	Exhibit A3	Exhibit 3, page -825 (entire	Google (Cramer

1	page).	Declaration ¶29)	
2	Exhibit A3	Exhibit 3, page -827 (entire box under the slide title and icons).	Google (Cramer Declaration ¶30)
3	Exhibit A3	Exhibit 3, page -828 (entire box under “1) Prioritize Play”; entire box under the icons under “2) Boost x-PA Product Adoption”).	Google (Cramer Declaration ¶31)
4	Exhibit A3	Exhibit 3, page -829 (entirety of the four rows in the chart).	Google (Cramer Declaration ¶32)
5	Exhibit A3	Exhibit 3, page -830 (the three boxes on the left side under “Target Developers”).	Google (Cramer Declaration ¶33)
6	Exhibit A3	Exhibit 3, page -831 (the entire box under slide title and three headings; between “packs with” and “-->”).	Google (Cramer Declaration ¶34)
7	Exhibit A3	Exhibit 3, page -832 (entire box under slide title and three headings).	Google (Cramer Declaration ¶35)
8	Exhibit A3	Exhibit 3, page -833 (entire box under slide title; between “2021 as” and “increases”).	Google (Cramer Declaration ¶36)
9	Exhibit A3	Exhibit 3, page -835 (box in the bottom right corner at the end of the arrow beneath “Niantic”).	Google (Cramer Declaration ¶37)
10	Exhibit A3	Exhibit 3, page -836 (entire first row until the slide title; text from “are win-win” through the end of that sentence; entire 3 bullet points under “Marketing opportunities”; entire 2 bullet points under “Playpoints”).	Google (Cramer Declaration ¶38)
11	Exhibit A3	Exhibit 3, page -838 (between “including” and “and 4 year”; entire chart under the slide title).	Google (Cramer Declaration ¶39)
12	Exhibit A3	Exhibit 3, page -839 (entire right-hand column under	Google (Cramer Declaration ¶40)

1	“Mitigation”; entire 3 bullet points beneath the chart).		
2	Exhibit A3	Exhibit 3, page -842 (entirety of the box; between “includes” and “and also accounts”).	Google (Cramer Declaration ¶41)
3	Exhibit A3	Exhibit 3, page -843 (entirety of the box under the slide title).	Google (Cramer Declaration ¶42)
4	Exhibit A3	Exhibit 3, page -844 (entirety of the box under the slide title; between “of top developers” and “A couple of partial”).	Google (Cramer Declaration ¶43)
5	Exhibit A3	Exhibit 3, page -845 (entirety of box under “Margin Impact (2019 - 2022)”).	Google (Cramer Declaration ¶44)
6	Exhibit A3	Exhibit 3, page -846 (entirety of box under “Margin Impact (2019 - 2022)”).	Google (Cramer Declaration ¶45)
7	Exhibit A3	Exhibit 3, page -847 (entirety of box under “Margin Impact (2019 - 2022)”).	Google (Cramer Declaration ¶46)
8	Exhibit A3	Exhibit 3, page -848 (text in title between “against” and “of margin”; entirety of box under slide title; text below box between “includes” and “and also”).	Google (Cramer Declaration ¶47)
9	Exhibit A3	Exhibit 3, page -850 (entire box under slide title “Developer Value View”).	Google (Cramer Declaration ¶48)
10	Exhibit A3	Exhibit 3, page -851 (entire box under slide title “Developer list”).	Google (Cramer Declaration ¶49)
11	Exhibit A3	Exhibit 3, page -852 (entire box next to “Developer Eligibility”; entire box next to “Developer Obligations”).	Google (Cramer Declaration ¶50)
12	Exhibit A3	Exhibit 3, page -853 (title text	Google (Cramer

1	between “Hug Devs:” and “and”; between “and” and “FTE”; and entire box below the title).	Declaration ¶51)	
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3	Exhibit A3	Exhibit 3, page -854 (title text from the beginning of the title until “for Hug devs”; from “for Hug devs” until the end of the title; and entire box below the title).	Google (Cramer Declaration ¶52)
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5	Exhibit A3	Exhibit 3, page -857 (subtitle text from “Project Play Spend =” until the end of that sentence; entirety of box under the subtitle).	Google (Cramer Declaration ¶53)
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7	Exhibit A3	Exhibit 3, page -859 (entire page).	Google (Cramer Declaration ¶54)
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9	Exhibit A3	Exhibit 3, page -860 (entire page).	Google (Cramer Declaration ¶55)
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11	Exhibit A3	Exhibit 3, page -861 (both bullet points in the first row to the right of the row title “Product”; both bullet points in the second row to the right of the row title “Financial”).	Google (Cramer Declaration ¶56)
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13	Exhibit A3	Exhibit 3, page -862 (all 3 bullet points in the second row under “Mitigation”; the text under “Play band dilution” and to the right of “Mitigation”; and both bullet points under “Mitigation”).	Google (Cramer Declaration ¶57)
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15	Exhibit A3	Exhibit 3, page -863 (under “Assumptions” the first bullet and its header; the third bullet and its header; and the fourth bullet and its header).	Google (Cramer Declaration ¶58)
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17	Exhibit A3	Exhibit 3, page -864 (text in the subtitle between “Integrate Samsung with” and “to help drive”; the entire chart including	Google (Cramer Declaration ¶59)
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1	footnotes under “Proposal / Details / Considerations”).		
2	Exhibit A4	Exhibit 5, page -107.R (between “Ask: Spend” and “in 2023”; between “Offer up to” and “Play rev”; between “to OEMs” and “to smaller OEMs”; between “spending est” and “in 2020”; between “up to” and “(steady state)”; between “total of” and “for Xiaomi”; between “Xiaomi and” and “for carriers”).	Google (Cramer Declaration ¶60)
3	Exhibit A4	Exhibit 5, page -108.R (both charts and associated text below the heading that begins with “Scope”).	Google (Cramer Declaration ¶61)
4	Exhibit A4	Exhibit 5, page -109.R (the figures in the columns with the headings beginning with “2017A” and “2018A”).	Google (Cramer Declaration ¶62)
5	Exhibit A4	Exhibit 5, page -111.R (the dollar amounts located in the two gray boxes at the bottom of the slide).	Google (Cramer Declaration ¶63)
6	Exhibit A4	Exhibit 5, page -112.R (the percentage figures underneath the headings “Core Experience”, “Optimized Experience”, and “Google Forward”).	Google (Cramer Declaration ¶64)
7	Exhibit A4	Exhibit 5, page -113.R (the percentage figures underneath the headings “Core Experience”, “Optimized Experience”, and “Google Forward”; the percentage figures between “carriers to spend” and “(ramp)”; between “Spend” and “of the incremental”).	Google (Cramer Declaration ¶65)
8	Exhibit A4	Exhibit 5, page -115.R (the specific dollar amounts on the	Google (Cramer Declaration ¶66)

1	slide).		
2	Exhibit A4	Exhibit 5, page -116.R (between "investing" and "per device", between "on Android" and "in 2023"; the dollar amounts in the graphic figure; between "generated" and "revenue"; between "GFD is" and "more expensive"; between "LG" and "savings"; the dollar amount preceding "in marketing").	Google (Cramer Declaration ¶67)
3	Exhibit A4	Exhibit 5, page -117.R (the bar chart underneath the heading "GDAF TAC Payments by Tier"; the dollar amounts in the columns with the headings "2018", "2019", "2020", "2021", "2022", and "2023"; the dollar amounts to the right of the table at the bottom of the slide).	Google (Cramer Declaration ¶68)
4	Exhibit A4	Exhibit 5, page -118.R (between "will reach" and "in 2023"; between "in 2023" and "from Play"; between "from Play" and "Search"; all dollar amounts in the columns with the headings "2018A"; "2019E"; "2020F"; "2021F"; "2022F"; "2023F" and "Two Year Term"; and between "reinvestment is" and "in each year").	Google (Cramer Declaration ¶69)
5	Exhibit A4	Exhibit 5, page -121.R (between "will reach" and "in 2023"; dollar amounts in the columns with the headings "2018A", "2019E", "2020F", "2021F", "2022F", and "2023F"; between "be between" and "GFWD"; between "enrollment of" and the end of the sentence; between "bonus rates" and "for most"; between "OEMs and" and "for Carriers").	Google (Cramer Declaration ¶70)
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1	Exhibit A4	Exhibit 5, page -122.R (between “to spend” and “to cover”; between “to cover” and “in key”; the dollar amounts and graphics below the headings “Case 1”, “[Recommendation] Case 2”, and “Case 3”).	Google (Cramer Declaration ¶71)	
2	Exhibit A4	Exhibit 5, page -123.R (the dollar amounts in the columns with the headings “2018A”, “2019E”, “2020F”, “2021F”, “2022F” and “2023F”).	Google (Cramer Declaration ¶72)	
3	Exhibit A4	Exhibit 5, page -124.R (the dollar amounts and percentage figures in the rows with the headings “High Case”, “Expected Case”, and “Low Case”).	Google (Cramer Declaration ¶73)	
4	Exhibit A4	Exhibit 5, page -125.R (the dollar amounts under the headings “Low End Risk”, “High End Risk”, and “Max At-Risk”).	Google (Cramer Declaration ¶74)	
5	Exhibit A4	Exhibit 5, page -126.R (the dollar amounts in the columns with the headings “2018A”, “2019E”, “2020F”, “2021F”, “2022F” and “2023F”; the percentage figure in the bullet point followed by “of Play revenue”).	Google (Cramer Declaration ¶75)	
6	Exhibit A4	Exhibit 5, page -127.R (the dollar amounts in the columns with the headings “2018A”, “2019E”, “2020F”, “2021F”, “2022F” and “2023F”; the percentage figures in the row with the heading “Huawei Redistribution of Revenue”).	Google (Cramer Declaration ¶76)	
7	Exhibit A4	Exhibit 5, page -128.R (under the heading “Underlying Assumptions”, the percentage	Google (Cramer Declaration ¶77)	

1	figures and dollar amounts; under the heading "Status Quo", the percentage figures and dollar amounts; under the heading "GDAF Expected Case").		
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4	Exhibit A4	Exhibit 5, page -129.R (between "Removal of" and "of forecasted"; between "will have" and "RevShare"; between "Fly Mobile will" and the end of the sentence; between "will have" and "RevShare").	Google (Cramer Declaration ¶78)
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9	Exhibit A4	Exhibit 5, page -146.R (percentage figures in the rows titled "Consideration" and "Uptake").	Google (Cramer Declaration ¶79)
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12	Exhibit A4	Exhibit 5, page -153.R (dollar amounts and figures in the columns with the headings "2018", "Q4 '18 Annualized").	Google (Cramer Declaration ¶80)
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14	Exhibit A4	Exhibit 5, page -157.R (between "to spend" and "to cover"; between "to cover" and "in key"; dollar figures in the column titled "Hedged ('23F")"; under the heading "Details", between "exposing" and "of annual", between "contributing" and "search rev", between "browsers exposing" and "of Google", between "putting" and "of Play").	Google (Cramer Declaration ¶81)
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21	Exhibit A4	Exhibit 5, page -158.R (between "propose investing", and "in getting"; between "in getting" and "devices"; between "GFD is" and "more"; between "LG" and "savings"; "between OEMs" and "savings per"; the figure that precedes "in marketing by carriers; the figures that precede "revenue uplift").	Google (Cramer Declaration ¶82)
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1	Exhibit A4	Exhibit 5, page -159.R (the dollar figures in the table).	Google (Cramer Declaration ¶83)	
2	Exhibit A4	Exhibit 5, page -160.R (the figures in the table).	Google (Cramer Declaration ¶84)	
3	Exhibit A4	Exhibit 5, page -161.R (the graph and table underneath the heading “So how do partner economics work?”).	Google (Cramer Declaration ¶85)	
4	Exhibit A5	Exhibit 6, page -008 (between “adding up” and “enterprise value”).	Google (Cramer Declaration ¶86)	
5	Exhibit A5	Exhibit 6, page -009 (the text next to the heading “WHAT”).	Google (Cramer Declaration ¶87)	
6	Exhibit A6	Exhibit 8, Bates -758.R (number above the leftmost column in the 2019 Global Mobile Revenues bar chart; percentage figure above “Android” in the leftmost column of the 2019 Global Mobile Revenues bar chart; all numbers below “Android” in the leftmost column of the 2019 Global Mobile Revenues bar chart; all numbers between “Other Android” and “Samsung” in the rightmost column of the 2019 Global Mobile Revenues bar chart; second bullet point between “Google is making” and “margin from premium”; third bullet point between “is not reversed” and “of incremental”; fourth bullet point between “to earn” and “in revenue”).	Google (Cramer Declaration ¶88)	
7	Exhibit A6	Exhibit 8, Bates -759.R (text in red box between “Google paid” and “in search”; number between “DCB revshare =” and “Search”; number after “Search revshare =”).	Google (Cramer Declaration ¶89)	
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1	Exhibit A6	Exhibit 8, Bates -760.R (percentage figure and dollar amount above bar chart titled “Samsung TAC”; percentage figure and dollar amount above bar chart titled “Samsung RSA Active Devices”; all numbers in bar chart titled “As-Is RSAv Projection (2020-24)”; first bullet point in rightmost column between “search at” and “TAC”; number between “ID revenues” and “in TAC”; numbers between “Samsung devices” and “January was”; number between “January was” and “April was”; number between “April was” and “down”; number between “down” and “update commitment”).	Google (Cramer Declaration ¶90)	
13	Exhibit A6	Exhibit 8, Bates -761.R (all text contained in the four bullet points below “Proposed New Deal (4 Year Term)”; number in box at the bottom of the slide before “total deal size”; numbers between “renewed as is” and “based on market”).	Google (Cramer Declaration ¶91)	
18	Exhibit A6	Exhibit 8, Bates -762.R (number in the leftmost column between “devices on Samsung ID” and “over 4 yrs”; number in the middle column between “Samsung devices” and “over 4 yrs”; numbers in the rightmost column between “Japan, EEA” and “over 4 yrs”; number between “that justified the” and “TAC in the”).	Google (Cramer Declaration ¶92)	
25	Exhibit A6	Exhibit 8, Bates -763.R (number in the leftmost column between “devices on Samsung ID” and “over 4 yrs”; number between “that justified the” and “TAC in	Google (Cramer Declaration ¶93)	

1	the”).		
2	Exhibit A6	Exhibit 8, Bates -764.R (all numbers in the column of the bar chart titled “Status Quo”; all numbers in the column of the bar chart titled “New Deal”; percentage figure above “across the board” in the table titled “Current deal effective TAC rates”; all percentage figures in the table titled “New deal baseline TAC rates”).	Google (Cramer Declaration ¶94)
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9	Exhibit A6	Exhibit 8, Bates -765.R (number in the leftmost column between “devices on Samsung ID” and “over 4 yrs”; number in the middle column between “Samsung devices” and “over 4 yrs”).	Google (Cramer Declaration ¶95)
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13	Exhibit A6	Exhibit 8, Bates -766.R (dollar amounts contained in the three blue boxes on the far left of the slide below the heading “Incentivize through a combination of three mechanisms”; percentage figure between “install-base TAC” and “additional TAC on installed”; dollar amount between “payments” and “/month”; percentage figure between “revenue-share” and “on Chrome”; percentage figure between “as today)” and “revenue-share”; percentage figure between “Play” and “profit share”; dollar amount between “Total of” and “over 4 yrs”).	Google (Cramer Declaration ¶96)
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25	Exhibit A6	Exhibit 8, Bates -767.R (number in the leftmost column between “devices on Samsung ID” and “over 4 yrs”; number in the	Google (Cramer Declaration ¶97)
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1	middle column between “Samsung devices” and “over 4 yrs”; number between “add up to” and “over 4 years”).		
2	Exhibit A6	Exhibit 8, Bates -768.R (number between “designed with” and “incremental margin”; number in the light blue box at the top left of the slide, between “Search deal pays” and “to secure”; number in the light blue box at the top left of the slide, between “to secure” and “of incremental”; all numbers in the leftmost column of the bar chart titled “Dist’bn Search Revenue during term”; number at the top of the column of the bar chart titled “Payment to Samsung”; number at the top of the column of the bar chart titled “Incremental Deal Margin to Google”; number in the dark blue box at the top middle of the slide between “Services deal pays” and “to secure”; number in the dark blue box at the top middle of the slide between “to secure” and “of Play risk”; all numbers in the column of the bar chart titled “Services Revenue during term”; number at the top of the column of the bar chart titled “Payment to Samsung”; number at the top of the column of the bar chart titled “Incremental Deal Margin to Google”; number in the teal box at the top right of the slide, after “Distribution component is”; all numbers in the column of the bar chart titled “Incremental Value from Deal”; number at the top of the column of the bar chart titled “Payment to Samsung”; all numbers in the column of the bar	Google (Cramer Declaration ¶98)

1	chart titled “Incremental Deal Margin to Google”; numbers between “Ads, Messages” and “incremental revenue”; numbers between “revenue), Discover” and “incremental”; number before “(distribution search)”;		
2	number between “=” and “(widget)”;		
3	number between “+” and “(voice)”;		
4	number between “+” and “(S-browser)”;		
5	number before “grey”;		
6	number between “grey =” and “Play”;		
7	number between “+” and “from Chrome”;		
8	number between “or savings” and “risk protections”;		
9	number between “for Play” and “savings from”;		
10	number between “and then” and “uplift in value”).		
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12	Exhibit A6	Exhibit 8, Bates -769 (number in the leftmost column between “devices on Samsung ID” and “over 4 yrs”; number in the middle column between “Samsung devices” and “over 4 yrs”; numbers in the rightmost column between “Japan, EEA” and “over 4 yrs”).	Google (Cramer Declaration ¶99)
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18	Exhibit A6	Exhibit 8, Bates -770 (numbers between “stands to lose” and “in margin”; numbers after “LTV impact:”; all numbers in the middle and rightmost columns of the bar chart titled “Active Share”; all numbers in the middle and rightmost columns of the bar chart titled “Google Revenue (2020- 24)”; all numbers in all columns of the bar chart titled “Google Margin (2020-24)”).	Google (Cramer Declaration ¶100)
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26	Exhibit A6	Exhibit 8, Bates -772.R (numbers between “distribution” and “in additional”; numbers in	Google (Cramer Declaration ¶101)
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	1 leftmost blue box, below the 2 words “Signing Bonus”; text 3 below leftmost blue box, before 4 the words “signing bonus”; 5 numbers in the middle blue box, 6 below the words “Quality 7 Incentive”; text below the middle 8 blue box, before “per qualifying 9 device”; numbers in the 10 rightmost blue box, below the 11 words “Growth Incentive”; text 12 below rightmost blue box, before 13 the words “per OS switcher”; 14 numbers in yellow box, below 15 the words “Google Investment”; 16 text below yellow box, before 17 the words “match of payments”; 18 number between “marketing 19 spend” and “in headcount”; 20 numbers between “GTM 21 activities” and “only applies”; 22 number between “Samsung+” 23 and “to cover”).		
14	Exhibit A6	Exhibit 8, Bates -773.R (all text in bullet points below the heading “Distribution deals commitments, plus:”).	Google (Cramer Declaration ¶102)
15	Exhibit A6	Exhibit 8, Bates -774.R (percentage figure in blue box between “marketing” and “of all”; percentage figure in dark gray box between “marketing” and “of Samsung”; percentage figure in light gray box between “marketing” and “of Carrier”; number between “people” and “over 4 yrs”).	Google (Cramer Declaration ¶103)
16	Exhibit A6	Exhibit 8, Bates -777.R (number before the words “expected payout”; number between “payout+” and “upside”; all numbers in the leftmost “Status Quo” column of the bar chart titled “Deal Payments”; all	Google (Cramer Declaration ¶104)

	<p>1 numbers in the middle “Low 2 Case” column of the bar chart 3 titled “Deal Payments”; all 4 numbers in the rightmost “High 5 Case” column of the bar chart 6 titled “Deal Payments”; number 7 between the words “Low Case” 8 and “shipments @”; percentage 9 figure between the words 10 “shipments @” and “iOS”; 11 number between the words 12 “High Case” and “shipments 13 @”; percentage figure above the 14 words “across the board” in the 15 table titled “Current deal 16 effective TAC rates”; all 17 numbers in the table titled “New 18 deal consideration”).</p>		
12 13 14 15 16 17 18	Exhibit A6 Exhibit 8, Bates -778.R (numbers in dark blue box between “investment pays” and “to unlock”; numbers in dark blue box between “to unlock” and “incremental”; all numbers in the bar chart, including all numbers contained within and located above each of the three columns; percentage figure between “Conservative incremental” and “uplift”).	Google (Cramer Declaration ¶105)	
19 20 21 22	Exhibit A6 Exhibit 8, Bates -781.R (all percentage figures next to the dotted “High Impact Case” lines in the graph; all percentage figures in the rightmost column of the bar chart).	Google (Cramer Declaration ¶106)	
23 24 25	Exhibit A6 Exhibit 8, Bates -782.R (number between “G” and “(+ approx”; number between “+ approx” and “LTV”).	Google (Cramer Declaration ¶107)	
26 27	Exhibit A6 Exhibit 8, Bates -783.R (number between “may forego” and “in margin”; number between “risk	Google (Cramer Declaration ¶108)	

1	GM of" and "*includes"; number after "pre-covid at risk GM of"; all numbers in the bottom 7 rows of the table).		
2	Exhibit A6	Exhibit 8, Bates -784.R (number between "may forego up to" and "in margin"; number after "at risk GM of"; all numbers in the bottom 7 rows of the table; percentage figures contained in the far right column of the bar chart titled "Total Installed base").	Google (Cramer Declaration ¶109)
3	Exhibit A6	Exhibit 8, Bates -785.R (numbers between "stands to lose" and "in margin"; numbers between "LTV impact of" and "from Android"; numbers after "at risk GM of"; number after "Low impact: GM loss of"; number after "High impact: GM loss of"; number between "17p.p decline in total device share from 35% to" and "primarily"; number between "GM loss of" and "from 2020"; number between "risk GM of" and "LTV").	Google (Cramer Declaration ¶110)
4	Exhibit A6	Exhibit 8, Bates -786.R (all numbers in the bottom row of the table, between "G" and "Emerging HW ecosystem").	Google (Cramer Declaration ¶111)
5	Exhibit A6	Exhibit 8, Bates -791.R (all numbers in the table).	Google (Cramer Declaration ¶112)
6	Exhibit A6	Exhibit 8, Bates -792.R (number between "deal term" and "of distribution"; number between "deal pays" and "on all devices"; all dollar amounts and percentage figures in the charts and bar graphs; percentage figure	Google (Cramer Declaration ¶113)
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1	between “DEAL 2 ADDS” and “ON CHROME”; number after “(ROW) ADD’L”).		
2	Exhibit A6	Exhibit 8, Bates -793.R (all numbers in the table).	Google (Cramer Declaration ¶114)
3	Exhibit A6	Exhibit 8, Bates -794.R (all dollar amounts in the table titled “Payment to Samsung for Deal Term (4 Years)”; all dollar amounts in the table titled “Google Marketing Spend for Dealt Term (4 years)”; all dollar amounts in the table titled “Total Google Spend for Deal Term (4 years)”; number between “Signing bonus” and “(Samsung)”; number between “Base” and “per device”; numbers between “LTV and” and “revenue uplift”; number between “Bonus” and “additional per”; number between “based on” and “iPhone switcher”; number between “2021” and “initial Google”; number between “Base” and “per device”; number between “Bonus” and “additional per”).	Google (Cramer Declaration ¶115)
4	Exhibit A6	Exhibit 8, Bates -795.R (number between “to mitigate” and “of Play risk”; all dollar amounts contained in the bar graph titled “4- Year Play Margin at Risk (\$Bs)”; number between “BC (Apr’19):” and “margin at risk”; number between “Add’l” and “unmitigated risk”; number between “risk by” and “17 devs”; number between “reduce risk” and “Deal terms”; number between “Remaining risk of” and “90%”).	Google (Cramer Declaration ¶116)

1	Exhibit A6	Exhibit 8, Bates -796.R (all dollar amounts listed in table titled “Total Google Spend for Deal Term (4 years)”; all dollar amounts listed in the table titled “Incrtl Value Unlocked for Deal Term (4 years)”; all dollar amounts listed in the table titled “Net Deal Margin to Google for Deal Term (4 years)”; percentage figure between “Conservative incremental” and “uplift”).	Google (Cramer Declaration ¶117)	
8	Exhibit A6	Exhibit 8, Bates -797.R (all dollar amounts and percentage figures in all four tables).	Google (Cramer Declaration ¶118)	
10	Exhibit A6	Exhibit 8. Bates -798.R (all dollar amounts contained within the bar chart).	Google (Cramer Declaration ¶119)	
13	Exhibit A6	Exhibit 8, Bates -799.R (number between “Additional” and “in the US”; number between “TAC from” and “new devices”; percentage figure between “freed-up funds to” and “of funds on bounties”; percentage figure between “cleaned up devices” and “to Google controlled”; all numbers contained within the columns of the bar chart; all numbers in the chart on the far right below the column heading “2 Yr est”; all numbers in the chart on the far right below the column heading “5 Yr est.”).	Google (Cramer Declaration ¶120)	
23	Exhibit A6	Exhibit 8, Bates -802.R (all text below the column heading “2017 RSA deal”; all text below the column heading “2020 RSA deal”).	Google (Cramer Declaration ¶121)	
26	Exhibit A6	Exhibit 8, Bates -803.R (number between “Current RSA” and “if	Google (Cramer Declaration	

1	extended”; number between “paying” and “TAC”; number between “Browser” and “from IB”; number between “IB +” and “from browser”; all text in bullet points below heading “Global deal”; number between “by device” and “Only available”; all text in bullet points below heading “Only available outside EEA & RU”).	¶122)	
2	Exhibit A6	Exhibit 8, Bates -804.R (percentage figure in blue box between “marketing” and “of RSA”; percentage figure in dark gray box between “marketing” and “of Samsung RSA”; percentage figure in light gray box between “marketing” and “of Carrier RSA”).	Google (Cramer Declaration ¶123)
3	Exhibit A6	Exhibit 8, Bates -805.R (percentage figure in blue box between “marketing” and “of all RSA”; percentage figure in dark gray box between “marketing” and “of Samsung RSA”; percentage figure in light gray box between “marketing” and “of Carrier RSA”).	Google (Cramer Declaration ¶124)
4	Exhibit A6	Exhibit 8, Bates -808.R (all text in bullet points below the heading “What we get now”; number between “enrollment:” and “devices in RU”; number between “KR and” and “in ROW”).	Google (Cramer Declaration ¶125)
5	Exhibit A6	Exhibit 8, Bates -809.R (all text in bullet points below the heading “What we get now”).	Google (Cramer Declaration ¶126)
6	Exhibit A6	Exhibit 8, Bates -810.R (number between “up to” and “in additional incentives”; numbers	Google (Cramer Declaration ¶127)
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	1 in blue box below the words 2 “Initial Setup & Quality 3 Incentive”; numbers in blue box 4 below the words “Growth 5 Incentive”; all text in the two 6 bullet points next to “Samsung 7 Provides:”; dollar amount 8 between “Google payment to 9 Samsung” and “signing bonus”; 10 dollar amount between “Google 11 payment to Samsung” and “per 12 \$400+”; dollar amount before 13 “per OS switcher”; number 14 between “Google Marketing 15 investment” and “match”; dollar 16 amount between “Google 17 Marketing investment” and “in 18 marketing headcount”; number 19 between “Samsung (and” and “match”; dollar amount between “match” and “to cover”). 20		
13 14 15 16 17 18 19	Exhibit A7 13 14 15 16 17 18 19 Exhibit 10, Bates -967 (between “been considered” and “Eugene Liderman, 2020-09-29 08:04:23”; between “08:08:07” and “should we continue”; between “off-play risk has” and “Dave Kleidermacher, 2020-09- 29 08:09:35”; and between “with an MTD represent” and “of all AE devices”). 20	Google (Cramer Declaration ¶128) 21	
21 22	Exhibit A7 21 22 Exhibit 10, Bates -968 (between “malware rates” and “could help sway”; and between “going to say that” and “Eugene Liderman”). 23	Google (Cramer Declaration ¶129) 24	
25 26 27 28	Exhibit A8 25 26 27 28 Exhibit 11, Bates -897 (between “its objectives” and “Partnership sentiment”; between “program investment of” and “was”; between “was” and “less than what”; between “ASK 1” and “in additional investments”; between “new developers” and “in xPA”; 29	Google (Cramer Declaration ¶130) 30	

1	between “includes” and “in additional”).		
2	Exhibit A8	Exhibit 11, Bates -900 (between “developers drove” and “of Alphabet’s”; between “developers” and “over GVP 2019”; all numbers on the vertical axis of the bar chart; all numbers in all columns of the bar chart; between “Play” and “of annual revenue”).	Google (Cramer Declaration ¶131)
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25	Exhibit A8	Exhibit 11, Bates -901 (numbers before “devs signed”; between “devs signed” and “sentiment improved”; between “incentives were” and “enabling GCP”; numbers between “Play Users” and “target devs”; between “target devs” and “of Play spend”; between “GVP 2019” and “on Play (247”; between “Sentiment” and “asked about service”; between “pre signing” and “Developers”; between “GVP 2019” and “developers are in”; between “Value” and “in incremental GCP”; between “including” and “new accounts”; between “cohort growing” and “faster”; all percentage figures between “GCP overall” and “revenue uplift”; between “ve ROI” and “uplift in developer”; between “target list of” and “counts ABK”; between “separately by BC” and “new accounts”; between “accounts include” and “GVP 2021”; all text after “Ads ROI by”).	Google (Cramer Declaration ¶132)
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	<p>1 using BAU”; between “BAU 2 funds” and “Apply incentive”; 3 between “RENEW selectively” 4 and end of sentence; between 5 “NO RENEWALS for devs” and 6 end of sentence; all developer 7 logos and names; numbers 8 between “Only” and “GVP 2019 9 devs”; between “programs for 10 strategic priorities, eg” and end 11 of sentence; between “GVP 2019 12 deal term” and “Only”; between 13 “Only” and “All other 14 incentives”; between “All other 15 incentives” and end of sentence; 16 all text between the URL below 17 the slide and the end of the 18 page).</p>		
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	Exhibit A8 Exhibit 11, Bates -903 (between “consume only” and “in net investment”; between “net investment vs.” and “expected”; all numbers in the table; between “Commits unlocked” and “incremental revenue”; between “signing resulting in” and “Play”; between “Play” and “but also”; between “achieved” and “than expected on marketing”; between “Figures include” and “in refreshed”; between “investments” and “net investment”; between “GVP partners was” and “for each of”; between “GVP 2019 investments” and “we’d like”; between “developers beyond” and “being”; between “strategic priorities” and “GVP 2019”; between “originally include” and “This is a new”; between “Dev Sentiment” and “prod integration”; between “HC costs” and “program duration”; between “program duration” and “Deal	Google (Cramer Declaration ¶134)	

1	start”; between “ends after” and “Cloud value”).		
2	Exhibit A8	Exhibit 11, Bates -905 (between “on Play has” and “since”; all numbers on the vertical axis of the bar chart; all numbers in the columns of the bar chart ; all numbers next to the arrows on the right of the bar chart; numbers in the key/legend of the bar chart between “Devs w/” and “in”; between “of GVP, we ask” and end of sentence).	Google (Cramer Declaration ¶135)
3	Exhibit A8	Exhibit 11, Bates -906 (between “partnership with” and “of Play’s large”; between “developers” and “of Play spend”; all developer names/logos, as well as percentage figures, in the four boxes on the right half of the slide; between “2019 as they lacked” and end of sentence; between “eligibility criteria” and “spend from”; between “spend from” and “spend on Play”; between “Play OR” and “spend on Play”; between “spend on Play” and “AND”; between “AND” and end of sentence).	Google (Cramer Declaration ¶136)
4	Exhibit A8	Exhibit 11, Bates -907 (between “devs selected based on” and “Ads”; between “Ads - based on” and “Play”; between “Play offers” and “unlocked”; between “unlocked by” and “Marketing”; between “Play” and “Strategic Product”; between “Product commits” and “integration”; between “Game quality” and “to ensure”; between “scale products through” and “Automate”; between “manual efforts” and “Term”; between “Term” and “for all offers”; between “offers	Google (Cramer Declaration ¶137)

	<p>1 except” and “renewal based”; 2 between “based on” and 3 “Consults”; between “Drop” and 4 “Add”; between “Add” and end 5 of sentence; between “aspects such as” and “continue to”; between “mandate” and “in GVP”).</p>		
6 Exhibit A8 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	<p>Exhibit 11, Bates -908 (all dollar amounts in table; between “Cloud” and “down from”; between “down from” and “of Play”; between “UAC credits” and “down from”; between “down from” and “of Ad”; between “Play:” and “Marketing”; between “Marketing” and “in the base”; between “with performance for” and “Direct”; between “costs include” and “in GVP incentives”; between “Cloud” and “Ads”; between “Ads” and “Play marketing”; between “GPP” and “GVP incentives”; between “Play spend” and “down from”; between “down from” and “NOTE”; between “Dev Sentiment” and “strategic product”; between “HC costs” and “program duration”; between “mostly” and “No extension”; between “Base” and “GCP TAM”; between “GCP TAM” and “utilization”; between “utilization” and “Ad uplift”; between “Ad uplift” and “base”; between “Low” and “GCP TAM”; between “GCP TAM” and “utilization”; between “utilization” and “Ad uplift”; between “Ad uplift” and “base”; between “High” and “GCP TAM”; between “GCP TAM” and “utilization”; between</p>	<p>Google (Cramer Declaration ¶138)</p>	

1	“utilization” and “Ad uplift”; between “Ad uplift” and “base”).		
2	Exhibit A8	Exhibit 11, Bates -911 (between “within” and “range approved”; all developer names except “Riot” and “ABK” in the table; all numbers in the table; between “BC approved” and “value range”; between “Includes” and “who is currently negotiating”; between “a commit” and “underperformed on Play”).	Google (Cramer Declaration ¶139)
3	Exhibit A8	Exhibit 11, Bates -912 (all numbers in the table; between “Cloud” and “down from”; between “down from” and “of Play”; between “UAC credits” and “down from”; between “down from” and “of Ad”; between “Play:” and “Marketing”; between “Marketing” and “in the base”; between “with performance for” and “NOTE”; between “expected to” and “for each of”; between “transfers will be” and “but the overall”; between “still be” and “Regarding GVP”; between “credits were at” and “of Play spend”; between “spend except for” and “Ads credits”; between “were at” and “of ads spend”; between “except for” and “High case”; between “High case” and “contribution margin”; between “GCP opportunity” and “of TAM”; between “TAM) and” and “utilization”; between “Ads” and “revenue uplift”; between “Dev Sentiment” and “strategic product”; between “HC costs” and “program duration”; between “mostly” and “No extension”; between “Base” and “GCP	Google (Cramer Declaration ¶140)

1 2 3 4 5 6 7 8 9	TAM”; between “GCP TAM” and “utilization”; between “utilization” and “Ad uplift”; between “Ad uplift” and “base”; between “Low” and “GCP TAM”; between “GCP TAM” and “utilization”; between “utilization” and “Ad uplift”; between “Ad uplift” and “base”; between “High” and “GCP TAM”; between “GCP TAM” and “utilization”; between “utilization” and “Ad uplift”; between “Ad uplift” and “stretch”).		
10 11 12 13 14 15 16 17 18 19 20 21 22 23	Exhibit A8 Exhibit 11, Bates -913 (between “Refreshes” and “Google Contribution”; all dollar amounts in table; between “Note: the” and “play revenue allocation”; between “margin outlook” and “for Play”; between “for Play” and “for Cloud”; between “for Cloud” and “for Ads”; between “for Ads” and “for YT”; between “Figures include” and “in refreshed”; between “Marketing” and “(Gross)”; between “(Gross)” and “(Net)”; between “esports” and “(Gross)”; between “Loyalty” and “devs”; between “devs” and “(Gross)”; between “(Gross)” and “(Net)”; between “Ads” and “devs”; between “devs” and “(Gross)”; between “(Gross)” and “(Net)”; between “expected to be” and “NOTE”; between “partners was” and “for each of”).	Google (Cramer Declaration ¶141)	
24 25 26 27	Exhibit A8 Exhibit 11, Bates -915 (text in the box below the heading “GVP Commercial Tactics” between “Ads Spend (AIP)” and “NEW”; all text in the light blue box to	Google (Cramer Declaration ¶142)	

1	the right of the heading “Growth Package”; between “to hitting” and “thresholds”; all text in the light blue box at the bottom of the slide, to the right of the heading “Consulting Package”).		
2	Exhibit A8	Exhibit 11, Bates -917 (between “GCP Credits” and “of developer’s”; between “issued every” and “months”; between “key title moments via” and “Ads credits”; between “credits from” and “of developer spend”; between “spend to” and end of sentence; all text in the four bullet points next to the heading “Community Development”; between “Increased participation” and “from top partners”).	Google (Cramer Declaration ¶143)
3	Exhibit A8	Exhibit 11, Bates -918 (all text in the four bullet points below the heading “Build & Test”; all text in the five bullet points below the heading “Launch & Grow”; text below the heading “User Acquisition” between “Ads credits” and end of sentence; all text in the four bullet points below the heading “Community Development”; all text in the two bullet points below the heading “Prioritize Play Users”; between “strategic priorities” and “Maintain”).	Google (Cramer Declaration ¶144)
4	Exhibit A8	Exhibit 11, Bates -919 (text in column titled “GVP 2019” between “PC/Console Devs” and “Play Devs”; text in column titled “GVP 2019” between “Play Devs” and “Commercial:”; percentage figure in column titled “GVP 2019” between “Ads credits” and “of eligible”; text in	Google (Cramer Declaration ¶145)

	<p>1 column titled “GVP 2019” 2 between “UAC spend” and 3 “GCP credits”; percentage figure 4 in column titled “GVP 2019” 5 between “GCP credits” and “of 6 Play Consumer”; text in column 7 titled “GVP 2019” between 8 “Consumer Spend” and 9 “Comarketing”; text in column 10 titled “GVP 2019” between 11 “Comarketing” and “YouTube 12 Presence”; text in column titled 13 “GVP 2019” between “Grants” 14 and “esports”; text in column 15 titled “GVP 2019” between 16 “sponsorships” and 17 “Consultative”; text in column 18 titled “GVP 2019” between 19 “Consultative” and “of 20 respective Play”; text in column 21 titled “GVP 2019” between 22 “Consumer spend” and “for GCP 23 credits”; text in column titled 24 “GVP 2019” between “for GCP 25 credits” and “for all else”; text in 26 column titled “GVP 2019” 27 between “for all else” and “to 28 extend”; text in column titled 29 “GVP 2019” between “to 30 extend” and “for select devs”; 31 text in column titled “GVP 32 2019” between “for select devs” 33 and bottom of column; text in 34 column titled “GVP 2021” 35 between “PC/Console Devs” and 36 “Play Devs”; text in column 37 titled “GVP 2021” between 38 “Play Devs” and “Commercial.”; 39 text in column titled “GVP 40 2021” between “Ads credits” and 41 “of UAC spend”; text in column 42 titled “GVP 2021” between 43 “UAC spend” and “GCP 44 credits”; percentage figure in 45 column titled “GVP 2021” 46 between “GCP credits” and “of 47</p>		
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	<p>Play Spend”; percentage figure in column titled “GVP 2021” between “Play Spend” and “retirable against”; text in column titled “GVP 2021” between “Comarketing” and “YouTube Presence”; text in column titled “GVP 2021” between “Grants” and “esports”; text in column titled “GVP 2021” between “sponsorships” and “Consultative”; text in column titled “GVP 2021” between “Consultative” and “Public support for”; text in column titled “GVP 2021” between “Public support for Play Partnership” and “of respective Play”; text in column titled “GVP 2021” between “spend (except” and “for all incentives”; text in column titled “GVP 2021” between “incentives except” and “renewed”; text in column titled “GVP 2021” between “ROI eval” and end of column).</p>		
17 18 19 20 21 22 23 24	Exhibit A8 Exhibit 11, Bates -920 (between “Appendix J” and “target”); between “representing” and “of Play spend”; between “users via” and “on Play”; all numbers in the bar chart titled “2020 Play A&G Spend”; percentage figure before “of titles”; between “of titles” and “247”; all developer names and logos, except Riot Games, Activision Blizzard and Supercell; developer name before “is signing up to”).	Google (Cramer Declaration ¶146)	
25 26 27	Exhibit A8 Exhibit 11, Bates -921 (all developer logos and names, except for Riot Games, Activision Blizzard, and	Google (Cramer Declaration ¶147)	

1	Supercell).		
2	Exhibit A8	Exhibit 11, Bates -922 (entire table, except for the names “Riot Games, Inc.” and “ABK”).	Google (Cramer Declaration ¶148)
3	Exhibit A8	Exhibit 11, Bates -923 (all percentage figures in the table titled “BC Success Metrics”; all dollar amounts and percentage figures in the table titled “Other Metrics”; text between “ABK” and “Titles”; between “COD” and “Titles”; between “Titles: 3” and “Titles:”; between “Not closed” and “TOTAL”; between “TOTAL” and “Incremental”; between “Incremental” and “Cloud KPI”; between “total” and “HUG BC”; between “total” and “and HUG new”; between “total” and “Win-rate acceleration”; between “conversion was” and “w/o HUG”; between “HUG and” and “with HUG”; between “with HUG” and “=”; between “=” and “Already signed”; between “Already signed” and “out of”; between “out of” and “developers so”; between “developers so” and “conversion”; between “conservatively at” and “through program”; between “duration” and “=”; between “=” and “Marquee titles”).	Google (Cramer Declaration ¶149)
4	Exhibit A8	Exhibit 11, Bates -924 (text in slide title after “Appendix O:”; between “discussion on x-platform gaming” and end of sentence; between “GVP & launched” and “titles”; between “dev sentiment” and “enabled Play”; between “launch for” and “Play’s”; text before “up-leveled	Google (Cramer Declaration ¶150)

1 2 3 4 5 6 7 8	Play”; between “up-leveled Play -” and “partnership”; between “Strengthened” and “partnership”; ‘between “EAPs” and “first in KR”; between “adopt” and “successful pilot”; between “cadence w/” and “leadership”; between “results from” and “in”; between “in” and “Spend till”; between “date” and “from”; between “from” and “Created incremental”; between “users” and “titles launched”).		
9 10 11 12 13	Exhibit A8 Exhibit 11, Bates -925 (all developer names and percentage figures in table; text between “GVP with” and “due to”; text before “titled are published”; between “3rd party developers” and “for”; between “for” and “due to which”; between “invest behind” and “high”).	Google (Cramer Declaration ¶151)	
14 15 16 17 18 19 20 21 22 23 24 25 26 27	Exhibit A8 Exhibit 11, Bates -926 (percentage figure between “Actual” and “Incrementality”; percentage figure below “Low SVA Adoption”; number before “developers receiving UAC”; between “Hug with” and “in credits”; between “budget of” and “of total GVP”; between “uplift of” and “increase in”; between “an average” and “across most”; between “credits delivered” and “with the implied”; between “uplift being” and “the original BC”; between “but overall” and “driven by”; between “Adopt” and “model”; between “release structure” and “2021: Build new”; between “equivalent to” and “of released”; between “assumption =” and “uplift”; between “uplift”	Google (Cramer Declaration ¶152)	

1	and “of”; between “of” and “vs actual”; between “uplift of” and “Latest”).		
2	Exhibit A8	Exhibit 11, Bates -927 (between “Ads ROI is” and “while overall”; between “ROI remains” and “Through incrementality”; between “BC expectations” and “Ads ROI”; between “Only” and “of Ad credits”; between “leaving” and “on the table”; between “negotiation duration” and “leaving devs”; between “leaving devs” and “to fulfil”; between “slated to end” and “High credit caps”; between “low ad spenders” and “resulting in”; between “resulting in” and “redemption”; between “redemption” and “of credits”; between “redeemed by” and “rest of partners”; between “range from” and “redemption”; between “back from” and “to”; between “to” and “Limit customers”; between “GVP” and “secure budget”; between “Standard” and “deal mechanism”).	Google (Cramer Declaration ¶153)
3	Exhibit A8	Exhibit 11, Bates -928 (between “Developer” and “ad credit deals”; between “completed” and “earned to”; between “earned to through” and “to ABK”; entire table; footnote following asterisk below table).	Google (Cramer Declaration ¶154)
4	Exhibit A8	Exhibit 11, Bates -929 (between “partner engagement” and “Strong desire to”; between “to avoid” and “given intensive”; between “in case of” and “ads finance”; between “approvals required” and “Ads committing”; between “committing to” and “to	Google (Cramer Declaration ¶155)

1	start”; between “securing budget for” and “at BC”; between “Evaluation of” and “to require”; between “Should ads continue” and “commitment”; between “APAC concerns” and “Ads to support”; between “to support” and “with BC approval”; between “email for” and “Please let us”).		
7	Exhibit A8	Exhibit 11, Bates -930 (dollar amount between “Actual” and “Incremental”; percentage figures between “ARR acceleration” and “(by”; between “Key Highlights” and “developers receiving”; between “deals with” and “of the”; between “of the” and “developers collectively”; all text below slide listing developers, dollar amounts and start dates).	Google (Cramer Declaration ¶156)
14	Exhibit A8	Exhibit 11, Bates -931 (between “Developer Status” and “contracts signed”; names of all developers listed below the heading “H1’20 Signers”; names of all developers, except Riot Games and Activision Blizzard, listed below the heading “H2’20 Signers”; text between “for GCP credits” and “titles developers”).	Google (Cramer Declaration ¶157)
21	Exhibit A8	Exhibit 11, Bates -932 (between “commit with ABK” and “Riot”; between “+\$20M incremental” and “Negotiating”; between “Negotiating” and “TOTAL”; between “TOTAL” and “Incremental”; number after the word “Incremental:”).	Google (Cramer Declaration ¶158)
26	Exhibit A8	Exhibit 11, Bates -933 (text in leftmost green box between “Signed” and “incremental	Google (Cramer Declaration ¶159)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	GCP”; between “commits” and “customers”; between “Play investing” and “in credits”; between “in credits” and “Y1 consumption”; between “(\$230M) and” and “are 2 of Cloud’s”; between “Cloud’s largest deals” and “increased commit”; between “year” and “negotiating early”; between “accelerated” and “4 qtrs.”; between “Forecasting” and “incremental Cloud”; between “post-deferrals over 4 years” and “target customers”; between “revenue deferrals” and end of sentence; between “Only” and “of customers signed commits”; between “pushing remaining to” and end of sentence; between “contributed” and “of region’s GCP”; between “Largest customers” and “in NorthAm”; between “account for” and “of HUG 1.0”; between “APAC/JP” and “of customers in”; between “in EMEA” and “spent”; between “spent” and “revenue”; between “unblocked commit deals in H2’2020” and end of sentence).		
19 20 21 22 23 24 25 26 27	Exhibit A8 Exhibit 11, Bates -934 (between “expands customers by” and “and expected”; between “to drive” and “incr. revenue”; between “Highlights” and “customers in-scope”; between “customers included” and “are 2 of”; between “largest projected deals” and “have strong potential”; between “strong potential” and “of the customers”; between “EMEA customers” and end of sentence; entire bar chart titled “HUG 2.0	Google (Cramer Declaration ¶160)	

1	Projected Rev. Uplift"; footnote no. 1 before "ongoing legal concerns").		
2	Exhibit A8	Exhibit 11, Bates -935 (all percentage figures in column titled "Projected"; all percentage figures in column titled "Actual").	Google (Cramer Declaration ¶161)
3	Exhibit A8	Exhibit 11, Bates -936 (entire table, except for the names of "Activision Publishing, Inc.," "Riot Games, Inc.," "Blizzard Entertainment, Inc.," and "King").	Google (Cramer Declaration ¶162)
4	Exhibit A9	Exhibit 12, Bates -102 (between "expanded from" and "We believe Deals 1"; between "did two things" and "This reduces"; between "average) from" and "saving"; between "saving" and "We also"; between "We also" and "saving"; between "saving" and "Then, we provided"; between "Samsung by giving" and "given the"; between "for Samsung to" and "The Chrome and S Browser"; between "impact payments by" and "and we"; between "collectively save" and "from Deal 1"; between "Samsung RSA deal" and "through Deal 1"; between "along with" and "On a device-by-device"; between "election" and "Samsung can also"; between "Samsung can also" and "ex-Europe"; between "In Europe" and "we also get"; between "we also get" and "to promote Google services"; between "deal amounts to" and "devices over"; between "over 4 years, and" and "This"; between "This" and "on the install base";	Google (Cramer Declaration ¶163)

	<p>1 between “install base represents” 2 and “over”; between “over” and 3 “Note: Some carriers”; between 4 “In addition to the” and “we also 5 provide”; between “we also 6 provide” and “The”; between 7 “The” and “is projected to be”; 8 between “is projected to be” and 9 “and -1 share”; between “share 10 to” and “over”; between “over” 11 and “with potential high 12 variability”; between “we also 13 added” and “bonus”; between 14 “originally” and “and located in 15 Deal 3”; between “we are still” 16 and “the prior as-is deal”; 17 between “allows Samsung to” 18 and “Samsung will earn”; 19 between “Samsung will earn” 20 and “to be added”; between “for 21 every” and “additionally up to”; 22 between “additionally up to” and 23 “The current switcher”; between 24 “rate is at” and “but Samsung”; 25 between “but Samsung can” and 26 “Example”; between “Example: 27 if they” and “the per device”; 28 between “device incentives” and 29 “for the two”; between “we will 30 fund” and “to this GTM”; 31 between “GTM Fund over” and 32 “We have also”; between “for 33 Google to” and “An 34 incremental”; between “An 35 incremental” and “has also 36 been”; between “to support” and 37 “for their watches”; between 38 “not to pursue” and “Play Store”; 39 between “This saves us” and 40 “over”; between “over” and “We 41 also did”; between “did not get” 42 and “as had originally”; between 43 “The” and “to Samsung was also 44 removed”; between “Within Deal 45 3” and “which will”; between “of 46 countries were” and end of</p>		
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1	page).		
2	Exhibit 12, Bates -103 (between "all)" and "As noted above"; between "also migrated the" and "from Deal 3"; between "motivate closure" and "(Please note"; between "Deal 2 was" and "Combining deals"; between "the range is" and "the projected prior"; between "projected prior deal" and "to"; between "to" and "in the case that"; between "Updated deal size" and "(includes"; between "guidance of" and "and within"; between "margin guidance of" and "Key structural"; between "Browsers" and "and Search"; between "which includes" and "and Deal 3"; between "was strictly" and end of sentence; between "Timing" and "for Deals 1 and 3"; between "Deals 1 and 3" and "for Deal 2"; between "the prior deal was" and "was extended"; between "Samsung Browser" and "Enhanced Search"; between "Enhanced tier" and "Assistant"; between "Assistant" and "increased promotion"; between "for enhanced devices" and "Chrome"; between "Chrome" and "SUW screens"; between "SUW screens" and "both numbers in gross"; between "across" and "DEAL 2"; between "Cloud interoperability" and end of page).	Google (Cramer Declaration ¶164)	
24	Exhibit A9	Exhibit 12, Bates -104 (between "devices" and "-1"; between "-1" and "Google will be"; between "Google will be" and "and user will"; between "able to" and "+1	Google (Cramer Declaration ¶165)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	action away”; between “triggered by” and “Note: we provide”; between “an additional” and “of payment”; between “three items” and “Deal 3”; between “Public commitment for” and “and”; between “and” and “for devices”; between “for devices” and “Note:”; between “trickle down to” and “at a cadence”; between “Samsung to implement” and “for a total”; between “for a total of” and end of sentence; between “and have voice” and “strategy for”; between “strategy for” and “to increase share”; between “GTM support for” and “and also”; between “product asks” and “What did”; between “from the prior agreement” and “Project economics”; between “re-signed ‘as is’ for” and “New deal”; between “New deal =” and “than projected”; between “D3=” and “Install base payments”; between “Install base payments” and “except”; between “New device payments” and “New service payments”; between “Messages” and “Projected deal margins”; between “deal margins of” and “over”; between “over” and “incremental revenue”; between “approved guidance of” and “GTM Fund”; between “from deal 3” and “includes”; between “includes” and “D2 signing bonus”; between “bonus and” and “for Wear”; between “deal margin” and “within BC approved”; between “approved guidance of” and end of page).		
Exhibit A9	Exhibit 12, Bates -105 (between “HC costs” and “which	Google (Cramer Declaration	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<p>includes”; between “includes up to” and “Relative to prior”; between “Samsung are potentially” and “for the prior”; between “Updated deal size of” and “is within”; between “BC-approved guidance of” and “and within”; between “margin guidance of” and “for D1”; between “and” and “for D3”; between “Install base” and “of gross”; between “of gross” and “New devices”; between “New devices”; and “weighted average”; between “savings comes from” and “of revenue”; between “of which” and “comes from GSA”; between “a net effective” and “Giving opportunity”; between “telecom operator IDs” and “Deviations”; between “Did not get” and “Other items”; between “notifications to be handled” and “Samsung”; between “Did not get” and “Adjustments to payments”; between “payment to Samsung” and “Play revenue share”; between “Play revenue share” and “in Play revenue share”; between “in Play revenue share” and “Monthly payments”; between “Removed” and “in payments removed”; between “in payments removed” and “Signing bonus”; between “Signing bonus” and “to close D2”; between “to close D2” and “for D3”; between “for D3” and “Business Messaging”; between “revenue share from” and “TBD”; between “TBD and” and “Funding for D3”; between “D3 GTM Fund” and “to GTM fund”; between “fund via” and “assumption”; between</p>	¶166	
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1	“assumption, while” and “Reinvestment”; between “Went” and “for install base”; between “add-in to reinvest” and “Discover”; between “Paying” and “Discover Play”; between “Play ads” and “which we”; between “TBD and” and “e.g. carrier-ranged”; between “distributed) projected impact” and end of page.)		
2	Exhibit A10	Exhibit 13, Bates -173 (between “chatted with t” and “about the doc”).	Google (Cramer Declaration ¶167)
3	Exhibit A10	Exhibit 13, Bates -174 (between “Schumacher, 2021-01-08 09: 57: 07 t” and “didn’t”).	Google (Cramer Declaration ¶168)
4	Exhibit A11	Exhibit 14 (Names of chat participants, except for first initials).	Google (Cramer Declaration ¶169)
5	Exhibit A11	Exhibit 14, Bates -332 (between “Play originally wanted” and “but then settled”; between “the teams agreed on” and end of sentence; between “really burdensome to” and end of sentence; between “mad at” and “and 2) also mad”; between “Google Ads can” and end of sentence).	Google (Cramer Declaration ¶170)
6	Exhibit A12	Exhibit 15, Page -690.R (between “GVP 1.0 Impact Assessment” and “GVP 1.0 x- Google Financial Assessment”).	Google (Cramer Declaration ¶171)
7	Exhibit A12	Exhibit 15, Page -694.R (text in row under “GVP 1.0 Target Developers:” and to the left of “Drive disproportionate value to Google”; text in row to the left of “Beacons of the ecosystem”; text in row to the left of “Expressed	Google (Cramer Declaration ¶172)

1	discontent over lack of unified support from Google”; text in row to the left of “May forgo Play (& Android)” and above “Full Partner List”; between “GVP targeted” and “major game”; between “e.g.” and “of total Play”).		
6	Exhibit A12	Exhibit 15, Page -695.R (between “Non Goals: Play exclusivity, drive additional xPA integrations (eg:” and “xPA spend commitments”).	Google (Cramer Declaration ¶173)
9	Exhibit A12	Exhibit 15, Page -697.R (Under leftmost column “1) Prioritize Play”, entire first bullet, second bullet between “of titles” and “on Play”, entire third bullet and entire fourth bullet; under middle column “2) Boost X-PA Product Adoption”, both highlighted dollar terms in second bullet and highlighted dollar term in third bullet; and in rightmost column “3) Improve Sentiment”, between “to date” and “devs”).	Google (Cramer Declaration ¶174)
17	Exhibit A12	Exhibit 15, Page -698.R (between “GOAL 1: Prioritize Play Users” and “target) devs representing”; between “target) devs representing” and “of total Play spend signed GVP,” column below “2019 Play A&G Spend”; entire contents of column below “100% of titles simshipped (184 titles)” and “Holding Out”; in box beneath “Holding Out”; from beginning of footer and “signing up to GVP obligations”).	Google (Cramer Declaration ¶175)
26	Exhibit A12	Exhibit 15, Page -699.R, BC Success Metrics column (between “ARR acceleration”	Google (Cramer Declaration ¶176)

	<p>1 and “2024”); between “2024” 2 and (by 2024”); between “Win- 3 Rate acceleration” and end of 4 row; between “N/A” and end of 5 row; between “UAC yoy growth 6 rate acceleration” and end of 7 row; between “SVA/Best 8 Practice adoption” and end of 9 row; between “Mobile game watchtime, as % of total gaming watchtime” and “(by 2022”); between (by 2022” and “(2020”); between “N/A” and end of row; between “upload uplift N/A” and end of row).</p>		
10 11 12 13	Exhibit A12 Exhibit 15, Page -699.R, Other Metrics column (between “Spend Commits” and end of row; between “Share of Wallet” and end of row; between “ROI” and end of row).	Google (Cramer Declaration ¶177)	
14 15 16 17 18 19 20 21 22 23 24 25 26 27	Exhibit A12 Exhibit 15, Page -699.R, (between “Cloud Deals” and end of paragraph; between “TOTAL” and “Incremental”; between “Incremental: and “M”; between “BC 5-year total:” and “HUG BC 5-year total:” and “and HUG new projected”; between “5-year total:” and “Win-rate acceleration.”; between “BC conversion was” and “w/o HUG and”; between “w/o HUG and” and “with HUG” and “=”; between “=” and end of sentence; between 12 out of 18 developers so” and “conversion.”; between “Estimating conservatively at” and “through program duration.”; between “through program duration.” and end of line; between ”9 titles include” and “migrating from”; from	Google (Cramer Declaration ¶178)	

1	“migrating from” and “-Expected to 13x spending”).		
2	Exhibit A12	Exhibit 15, Page -700.R, (between beginning of first line and “- new customer”; between beginning of second line “and new title”; between beginning of third line and “-Expected to 40x spending).	Google (Cramer Declaration ¶179)
3	Exhibit A12	Exhibit 15, Page -701.R (entire table below “Signed up to GVP”; entire table below “Holding Out”).	Google (Cramer Declaration ¶180)
4	Exhibit A12	Exhibit 15, Page -702.R (left column of table; between “Outside of” and “singularly focused”).	Google (Cramer Declaration ¶181)
5	Exhibit A12	Exhibit 15, Page -703.R (left column of table; between “Strategic partnership with” and end of line).	Google (Cramer Declaration ¶182)
6	Exhibit A12	Exhibit 15, Page -705 (between “positive contribution of” and end of line”; columns under “2019,” “2020,” “2021,” “2022”, “2019-2022”; between start of line and “incr. rev (from large”; between “endweighted, with” and “of ABK”; between “of ABK” and “package hitting 2020”; between “GVP at” and “reinvestment continues”).	Google (Cramer Declaration ¶183)
7	Exhibit A12	Exhibit 15, Page -706 (entire chart).	Google (Cramer Declaration ¶184)
8	Exhibit A12	Exhibit 15, Page -707 (between “even without” and “Play risk”; entire chart; “even without” and “Play risk mitigation”; between “investments of” and “over	Google (Cramer Declaration ¶185)

1	2019-2024”; between “to recoup” and “of invested value”; between “invested value” and “expected to sign incremental”; between “commits” and “and turn ROI”; between “+ve” and “esports investment”; between “investment with” and “adversely impacted”; between “adversely impacted” and “and program”; between “3 years for” and “UAC margin”; between “2019, and” and “thereafter”; between “to Cloud of” and “toward Cloud credits”; between “worth” and “by 2022”).	3	4
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1	beginning of sentence and “GVP 2.0 developers”; between “1 Excludes” and “who already have”; between “already getting” and “of Play spend”).		
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4	Exhibit A12	Exhibit 15, Page -715 (both figures and accompanying text; between “offered at” and “& met the following”; between “footprint;” and “incremental Google margin”; between “against investment of” and end of sentence; between “reduced rev share” and “Runway may help address”).	Google (Cramer Declaration ¶190)
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10	Exhibit A12	Exhibit 15, Page -717 (text in boxes below “Google Gives” and “Google Gets” and above “Eligibility criteria: expand”).	Google (Cramer Declaration ¶191)
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13	Exhibit A12	Exhibit 15, Page -718 (all text in columns under “Runway”; “GVP”; “GVP (in conjunction w/Runway”).	Google (Cramer Declaration ¶192)
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15			
16	Exhibit A12	Exhibit 15, Page -719 (all text in columns under “Option 1”, “Option 2”, and “Option 3”).	Google (Cramer Declaration ¶193)
17			
18	Exhibit A12	Exhibit 15, Page -722 (between “Lifetime Revenue of IP” and end of line under “GVP 1.0”; between “Lifetime Revenue of IP” and end of line under “GVP 1.0”; between “Lifetime Spend” and “OR”; between “Lifetime spend =” and “growing”; between “growing” and “OR”; between “Lifetime Spend” and “and growing”; between “and growing” and “YoY”; between “Lifetime Spend =” and “growing”; between “growing” and end of the line; entire rows beginning in “# of developers”,	Google (Cramer Declaration ¶194)
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1	“% of Play Spend covered”, “Google Gets”, and “Term”; between “Ad credits:” and “of eligible UAC spend”; between GCP credits” and “of Play Consumer Spend”; between “GCP credits” and “of Play Spend”; between “% investment” and “of respective Play”; between “Play consumer spend” and “of respective Play Consumer Spend”).		
8	Exhibit A12	Exhibit 15, Page -725 (between “cost by” and “mainly due to”; all figures in the table).	Google (Cramer Declaration ¶195)
10	Exhibit A12	Exhibit 15, Page -726 (text to the right of “Ads Credits”; text to the right of “GCP Credits”; text to the right of “Comarketing”).	Google (Cramer Declaration ¶196)
13	Exhibit A12	Exhibit 15, Page -728 (between “bundle with” and “offers the best”; four developer icons below “3 month trial”; icon to the right of “Android Premium Phone or Plan Purchase”; between start of bullet point and “marketing investment in ATL”; between start of bullet point and “marketing investment match”).	Google (Cramer Declaration ¶197)
19	Exhibit A12	Exhibit 15, Page -729 (icon to the right of “Android Premium Phone or Plan Purchase”; three developer icons below “Youtube Premium Free 3 month Trial”; all text in box called “Interactive sharers”; three icons to the left of “Free! 3P content offers (TBD)”; between “the world of” and “interact with”).	Google (Cramer Declaration ¶198)
26	Exhibit A12	Exhibit 15, Page -730 (between start of sentence and “year Spend commits”; second row in column	Google (Cramer Declaration ¶199)

1	named “Projected”; all information in column named “Actual”; between start of bullet point and “receiving GCP credits”; between “deals with” and “of the top”; between “of the top” and “developers collectively”; between “to spend” and “on IT in 2021”; all text below slide).		
7	Exhibit A12	Exhibit 15, Page -731 (all text following “incremental attributable to Hug”).	Google (Cramer Declaration ¶200)
9	Exhibit A12	Exhibit 15, Page -732 (entire chart; between start of bullet point and “developers expected to deliver”; between “to deliver” and “in IT spend in 2021”; between “a deal with” and “developers”; between “ GCP (up to” and “due to”; between “reside on GCP” and “uplift from standard”; between “discounts,” and “uplift from HUG”).	Google (Cramer Declaration ¶201)
17	Exhibit A12	Exhibit 15, Page -733 (all information in column beginning with “Actual”).	Google (Cramer Declaration ¶202)
19	Exhibit A12	Exhibit 15, Page -734 (all information in column beginning with “Actual”; between start of bullet point and “receiving UAC credits as”; between “Hug with” and “in credits received”; between “revenue uplift of” and “(which exceeds BC”; between “negative ROI of” and “through exceeded BC”; between “was equivalent to” and “of released credits”; between “of released credits” and “actual uplift range”; between “range of” and “based on analysis”).	Google (Cramer Declaration ¶203)

1	Exhibit A12	Exhibit 15, Page -735 (between “post-Hug indicates” and “(mainly”; between “(mainly” and end of line; between “continue to see an” and “across most clients”; between “indicates aggregate” and “which exceeds BC”; entire table; between “incrementality study” and “is attributable to Hug”; between “with the remaining” and “due to other factors”; between “Note:” and “has been removed”; between “removed from all” and “metrics, as they”; between “(new” and “deal effective”; between “Apr-20)” and “Hug treatment period is 12”; between “whereas” and “treatment period is only 3”; between “Consolidated” and “accounts for”; between “accounts for” and “of credits earned”; between “earned, and” and “of total uplift”).	Google (Cramer Declaration ¶204)	
16	Exhibit A12	Exhibit 15, Page -736 (between “increased from” and “based on the refreshed”; entire tables; between “Jun-20 was” and “of total UAC spend”; between “Hug was” and “on QS-only).	Google (Cramer Declaration ¶205)	
20	Exhibit A12	Exhibit 15, Page -737 (entire table; between “deals live;” and “earned to date”; between “earned to date” and end of sentence”; between “New” and “deal went live”; between “4/1/20. All” and “revenue from”; between “revenue from” and “included in”; between “included in the” and “line, as they have”; between “Nov-19” and “is active 8 months”; between “Note:” and “has been	Google (Cramer Declaration ¶206)	

1	removed”; between “removed from all” and “metrics, as they”; between “(new” and “deal effective”; between “Apr-20)” and “Hug treatment period is 12”; between “whereas” and “treatment period is only 3”).		
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5	Exhibit A12	Exhibit 15, Page -738 (all text following “major game developers”).	Google (Cramer Declaration ¶207)
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8	Exhibit A12	Exhibit 15, Page -739 (all icons below “Signed up to Hug – Contract Executed”, all icons below “various stages of redlining”, all icons below “holding out”).	Google (Cramer Declaration ¶208)
9			
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11	Exhibit A12	Exhibit 15, Page -740 (between “efforts on Play” and “launched on Play,” between “Other devs (e.g.” and “who previously”; between “cautious developers like” and “partnered on Play’s PC”).	Google (Cramer Declaration ¶209)
12			
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15	Exhibit A12	Exhibit 15, Page -741 (all text in all boxes).	Google (Cramer Declaration ¶210)
16			
17			
18	Exhibit A12	Exhibit 15, Page -743 (all text in rows beginning in “Google Gets” and “Google Gives”).	Google (Cramer Declaration ¶211)
19			
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21	Exhibit A12	Exhibit 15, Page -744 (between “DevRel Consultants” and end of column; between “YT Influencers” and end of column; between “UAC credits” and end of column; between “YT channel growth” and end of column).	Google (Cramer Declaration ¶212)
22			
23			
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25	Exhibit A12	Exhibit 15, Page -745 (all text in rows beginning with “Eligibility criteria”, “Google Gives”, “Google Gets”, and “Play %	Google (Cramer Declaration ¶213)
26			
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1	reinvested").		
2	Exhibit A12	Exhibit 15, Page -746 (entire chart; between “even without” and “Play risk mitigation”; between “outsized” and “investments diluted”; between “Program is ROI positive even without” and “Play risk mitigation”; between “investments of” and “(over 2019”; between “to recoupe” and “of value”; between “reflected in ROI” and “expected to sign”; between “GCP commits” and “and turn”; between “and turn” and “esports investment”; between “investment with” and “adversely impacted”; between “adversely impacted” and “and program”; between “for most devs” and “of UAC margin” between “2019, and” and “thereafter”).	Google (Cramer Declaration ¶214)
15	Exhibit A12	Exhibit 15, Page -749 (between “have signed up” and “target devs”).	Google (Cramer Declaration ¶215)
17	Exhibit A12	Exhibit 15, Page -753 (columns below “Deal structure option 1”, “Deal structure option 2” and “Deal structure option 3”).	Google (Cramer Declaration ¶216)
20	Exhibit A12	Exhibit 15, Page -754 (columns below “Deal structure option 1”, “Deal structure option 2” and “Deal structure option 3”).	Google (Cramer Declaration ¶217)
23	Exhibit A12	Exhibit 15, Page -757 (between “@” and “@google.com”; between “was calculated as” and “but has been”; between “revised to” and “(breakeven”; between “defined at” and “in credits”).	Google (Cramer Declaration ¶218)
27	Exhibit A13	Exhibit 19, Page 17, Line 21	Google (Cramer

1	(between “currently reside in” and “Q. And where are you”).	Declaration ¶219)	
2	Exhibit A13	Exhibit 19, Page 169, Line 19 (between “that up to over” and “of revenue was at risk”).	Google (Cramer Declaration ¶220)
3	Exhibit A14	Exhibit 21, Page 250, Line 7 (“permission to send” and “in 2020”).	Google (Cramer Declaration ¶221)
4	Exhibit A14	Exhibit 21, Page 310, Lines 7-22 (between “looking at nearly” and “sorry -- it’s in millions”; between “can’t be right.” and “right?”; between “A. It’s” and “I think that’s correct.”; between “Q. Of that” and “was going to be coming from”; between “Q. That’s” and “of the projected income”; between “for, you know” and “A. That is correct”; between “Q. And” and “was estimated to come from”).	Google (Cramer Declaration ¶222)
5	Exhibit A15	Exhibit 23 (Names of chat participants, except for first initials).	Google (Cramer Declaration ¶223)
6	Exhibit A16	Exhibit 24, Page -224 (between “discussion of” and “Brian is”).	Google (Cramer Declaration ¶224)
7	Exhibit A17	Exhibit 25, Page 360, Line 7 (between “Samsung” and “over four years”).	Google (Cramer Declaration ¶225)
8	Exhibit A17	Exhibit 25, Page 360, Line 18 (between “Samsung up to” and “for benefits”).	Google (Cramer Declaration ¶226)
9	Exhibit A17	Exhibit 25, Page 360, Line 23-25 (from “with Samsung.” to end of sentence).	Google (Cramer Declaration ¶227)
10	Exhibit A17	Exhibit 25, Page 366, Line 3 (between “Google projected” and “in service revenue”).	Google (Cramer Declaration ¶228)

1	Exhibit A17	Exhibit 25, Page 366, Lines 8-9 (from “second line,” to end of sentence).	Google (Cramer Declaration ¶229)	
2	Exhibit A17	Exhibit 25, Page 366, Lines 14-15 (from “could generate” to end of sentence).	Google (Cramer Declaration ¶230)	
3	Exhibit A17	Exhibit 25, Page 366, Line 19 (between “bar chart” and “is”).	Google (Cramer Declaration ¶231)	
4	Exhibit A17	Exhibit 25, Page 367, Line 12 (from “chart that says” to end of sentence) and Line 13 (from “You mean the” to end of sentence).	Google (Cramer Declaration ¶232)	
5	Exhibit A17	Exhibit 25, Page 367, Line 16 (from “That bar says,” to end of sentence).	Google (Cramer Declaration ¶233)	
6	Exhibit A17	Exhibit 25, Page 367, Line 20-21 (from “top that says” to end of sentence) and Line 24-25 and (between “is that” and “under the”).	Google (Cramer Declaration ¶234)	
7	Exhibit A17	Exhibit 25, Page 388, Line 3 (between “between” and “and” and between “and” and “correct”), Line 11 (between “between” and “and” and between “and” and “over”), and Line 19 (between “projected” and “to” and between “to” and “to” and “in revenue”).	Google (Cramer Declaration ¶235)	
8	Exhibit A17	Exhibit 25, Page 388, line 11 (between “over the” and “of”).	Google (Cramer Declaration ¶236)	
9	Exhibit A18	Exhibit 26, Page 6, Lines 5-6 (from “It’s” to end of sentence).	Google (Cramer Declaration ¶237)	
10	Exhibit A18	Exhibit 26, Page 345, Lines 10-	Google (Cramer	

1	11 (from “of that” to end of sentence”).	Declaration ¶238)	
2	Exhibit A18	Exhibit 26, Page 345, Line 13-19 (from “rev share has a” to end of sentence).	Google (Cramer Declaration ¶239)
3	Exhibit A18	Exhibit 26, Page 345, Line 20-21 (between “Google paid” and “to Apple”).	Google (Cramer Declaration ¶240)
4	Exhibit A18	Exhibit 26, Page 345, Line 23-24 (between “between” and “dollars”).	Google (Cramer Declaration ¶241)
5	Exhibit A18	Exhibit 26, Page 346, Line 13-14 (between “agreed to” and “in 2016”), Line 16 (between “pay Apple” and “percent”), Line 25 (between “Apple” and “percent”).	Google (Cramer Declaration ¶242)
6	Exhibit A19	Exhibit 27, Page 14, Lines 13-14.	Google (Cramer Declaration ¶243)
7	Exhibit A19	Exhibit 27, Page 179, Line 11 (between “up to” and “Is”).	Google (Cramer Declaration ¶244)
8	Exhibit A19	Exhibit 27, Page 179, Line 14 (between “that” and “would be”).	Google (Cramer Declaration ¶245)
9	Exhibit A20	Exhibit 28, Page -340 (between “come up with is –” and end of line).	Google (Cramer Declaration ¶246)
10	Exhibit A20	Exhibit 28, Page -341 (between “they can do” and “even if”, between “even if they offer” and end of chat, between “can do” and “a year” and between “missed...” and “that”).	Google (Cramer Declaration ¶247)
11	Exhibit A20	Exhibit 28, Page -341 (between “haha” and “they can do”).	Google (Cramer Declaration ¶248)

1	Exhibit A20	Exhibit 28, Page -342 (between “if” and “doesn’t”, between “come in...” and “and” between “and” and “may not”, between “they do” and “of”, between “of” and “...though”, between “nothing like” and “:(”, between “Especially” and end of line, between “still not” and “but not”, between “overall, with” and end of line, between “sell internally” and end of line, and between “felt the” and “and was”).	Google (Cramer Declaration ¶249)	
9	Exhibit A20	Exhibit 28, Page -342 (between “main risk would be” and end of line).	Google (Cramer Declaration ¶250)	
11	Exhibit A20	Exhibit 28, Page -342 (two lines between “crunched some numbers” and “so I think”).	Google (Cramer Declaration ¶251)	
13	Exhibit A20	Exhibit 28, Page -343 (between “lynchpin is” and end of line, between “it’s the” and “but”, between “vs” and “ok”, between “give us” and end of line, between “prepping him for” and “convo”, between “add to the” and “section”, and between “think of” and “...but”).	Google (Cramer Declaration ¶252)	
19	Exhibit A20	Exhibit 28, Page -344 (between “we’d first” and end of line).	Google (Cramer Declaration ¶253)	
21	Exhibit A20	Exhibit 28, Page -344 (between “couldn’t remember” and end of line, first word before “I think”).	Google (Cramer Declaration ¶254)	
23	Exhibit A20	Exhibit 28, Page -345 (between “can make it” and end of line, between “can put” and “and where”, between “end with” and “Did they”, “I’ll confirm” and “our term sheet”, between “term sheet says” and “I believe”,	Google (Cramer Declaration ¶255)	

1	between “he confirmed” and end of line”, between “end for” and “is defn wrong”).		
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3	Exhibit A20	Exhibit 28, Page -346 (between “I saw” and “...But”, between “updated to” and “because”, between “because of” and end of line, between “about the” and end of line, between “internal cost” and “ah”, between “internal cost for” and “is close”, between “close to” and “...So”, between “get the” and end of line, between “up to” and “and”, between “and the” and “over”, and between “pushed for” and end of line).	Google (Cramer Declaration ¶256)
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12	Exhibit A20	Exhibit 28, Page -347 (between “Google of” and “and a”, between “margin of” and “Total”, between “ABK is” and “we’re moving”, between “at either” and end of line, between “Brian” and “and it”, between “potential” and “in there”, between “for” and “do we”, and last line of page).	Google (Cramer Declaration ¶257)
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18	Exhibit A20	Exhibit 28, Page -348 (between “saying that” and “which would”, between “agreeing to” and “I just”, between “agreeing to” and end of line, between “down the” and “It then”, and between “getting” and end of line).	Google (Cramer Declaration ¶258)
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23	Exhibit A20	Exhibit 28, Page -349 (between “for” and “couldn’t”, between “for the” and end of line, “if we” and end of line, between “if we” and “would remain”, between “response on” and end of line, between “as us” and “I just”, between “agreeing to” and end of	Google (Cramer Declaration ¶259)
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1	line, between “down the” and “It then”, between “getting” and end of line, between “know that” and “(like”, and between “above)” and “is immaterial”).		
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4	Exhibit A20	Exhibit 28, Page -350-51 (between “worth considering” and “etc”, between “it’s the” and “it seems”, and between “referred to the” and end of line).	Google (Cramer Declaration ¶260)
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8	Exhibit A20	Exhibit 28, Page -351 (between “!!” and “(to Greg’s point”, between “to be” and end of line, between “comfortable with” and end of line, between “he said” and end of line”, between “do the” and end of line, between “should we offer to” and end of line, and between “you wondered” and end of line).	Google (Cramer Declaration ¶261)
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14	Exhibit A20	Exhibit 28, Page -352 (between “base tier os” and “and”, between “stretch is” and end of line, between “instead of” and end of line, between “gives them” and end of line, between “propose this...” and “...so”, between “for” and “I would be”, between “can get to” and “is still”, between “for” and “the shitty”).	Google (Cramer Declaration ¶262)
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21	Exhibit A20	Exhibit 28, Page -354 (between “circle on” and end of line, between “agree to” and end of line”, between “Greg” and end of line, between “this” and “is just”, between “agree to” and end of line, between “mention of” and “in ABK”, between “agree to” and end of line, and between “mention of” and “in ABK”).	Google (Cramer Declaration ¶263)
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27	Exhibit A20	Exhibit 28, Page -355-356	Google (Cramer
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1	(between “so for” and “they would”, between “ask for” and end of line, between “hardcore about” and end of line, between “it for” and “without”, between “considering” and end of line, and between “sounds good,” and end of line).	Declaration ¶264)	
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6	Exhibit A20	Exhibit 28, Page -357 (between “100%” and “keeping”, between “why not” and “im like”).	Google (Cramer Declaration ¶265)
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12	Exhibit A20	Exhibit 28, Page -358 (between “wondered” and “but I”, between “care about...” and end of line, between “WDYT” and “I know”, and between “and” and “let me know”).	Google (Cramer Declaration ¶266)
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17	Exhibit A20	Exhibit 28, Page -359 (between “did” and “make”, between “I saw” and “in last”, between “12*” and “2022 YTD”, between “then :)” and “isn’t that”, between “from” and “2022”, and between “YTD spend” and end of line).	Google (Cramer Declaration ¶267)
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22	Exhibit A21	Exhibit 28, Page 28, Lines 5-6 (between “direction” and end of sentence), and Line 8 (between “Is that” and end of sentence).	Google (Cramer Declaration ¶269)
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2 Dated: . , 2023

3 Honorable James Donato
4 United States District Judge
Northern District of California

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